

june 6, 2006

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Liberty League, Int. Distributor. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell my products.

I will be retiring from my full time job on August 25, 2006 after 34 years of service. I recently joined Liberty League, Int. to supplement my retirement income. As you know, healthcare costs are out of control with no relief in sight. It is necessary for me to generate incremental income so I can provide quality healthcare for myself and my wife. It is also necessary for me operate my own business with as much freedom and ease as possible.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Distributors. The Liberty League, Int. start-up kit only costs \$49.95. People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. I also think this seven-day waiting period is unnecessary, because Liberty League, Int. already has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Liberty League, Int. and will then need to send in many reports to my company headquarters. I feel this is very burdensome and unnecessary.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Liberty League, Int. is found guilty. Otherwise, Liberty League, Int. and I are put at an unfair advantage even though Liberty League, Int. has done **nothing** wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Liberty League, Int. headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft.

They will be reluctant to share their personal information with individuals they may have never met.

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals. **Please consider my position on this bill and the position of all the retired people that are trying to make ends meet.**

Thank you for your time in considering my comments.

Respectfully,